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VIA ECF

Hon. Gregory H. Woods, U.S.D.J.
 United States District Court, Southern District of New York
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street, Room 2260
 New York, NY 10007

**Re: GPC3 I, LLC v. Cort Javarone,
 Civil Action No. 1:25-cv-60-GHW**

Dear Judge Woods:

Our firm represents Plaintiff GPC3 I, LLC in the above matter. I recently filed with the Court a Waiver of Service executed by Defendant Cort Javarone (ECF No. 7). In accordance with Fed. R. Civ. P. 4(d)(3), Defendant's response to Plaintiff's Complaint is due on March 7, 2025. When returning the signed Waiver of Service to me, Defendant indicated he wished to ask for an additional 30 days in which to respond to Plaintiff's Complaint in order for him to secure counsel. This is Defendant's first requested extension and would move his deadline to April 7, 2025. Plaintiff has no objection to Defendant's request and has agreed to communicate it to Your Honor on his behalf.

In addition, an Initial Conference is currently scheduled for March 6, 2025, with the parties' Joint Letter and Proposed Case Management Plan due to the Court by February 27, 2025. (See ECF No. 6.) In light of Defendant's requested extension, I respectfully request that the Initial Conference be adjourned until a date after Defendant's deadline to respond to Plaintiff's Complaint to permit meaningful consultation with Defendant's counsel (or Defendant if he elects to proceed *pro se*). Currently, I am scheduled for a mediation on April 7, but am otherwise available at the Court's convenience. Thank you for your time and attention to this matter.

Respectfully submitted,

GENOVA BURNS LLC

/s/ Lawrence Bluestone

LAWRENCE BLUESTONE

LB:sm

c: Cort Javarone (via Email & UPS Ground)

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MEMORANDUM ENDORSED

January 21, 2025

Application granted. The parties' requests for extensions of the operative deadlines in this case, Dkt. No. 8, are granted. The deadline for Defendant to answer or otherwise respond to the complaint is extended to April 7, 2025. The initial pretrial conference scheduled for March 6, 2025 is adjourned to April 17, 2025 at 1:00 p.m. The joint status letter and proposed case management plan described in the Court's January 6, 2025 order are due no later than April 10, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 8.

SO ORDERED.

Dated: January 22, 2025
 New York, New York


 GREGORY H. WOODS
 United States District Judge